

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

American Civil Liberties Union,) Civil Action Number: 7:17-cv-01145-TMC-KFM
Foundation, American Civil)
Liberties Union Foundation of)
South Carolina,)
Plaintiffs,)
v.)
Spartanburg County, Chuck)
Wright, in his official capacity as)
the Spartanburg County Sheriff,)
and Allen Freeman, in his)
official capacity as administrator)
of the Spartanburg Detention)
Center,)
Defendants.)

)

**DEFENDANTS' ANSWER TO LOCAL RULE
26.01 INTERROGATORIES**

Defendants, by and through their undersigned counsel of record, hereby answer the Local Rule 26.01 Interrogatories as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER:

None known to counsel at this time.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER:

Jury. Defendants request trial by jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; (3) each publicly owned company in which the party owns ten percent of the outstanding shares.

ANSWER:

Not applicable.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER:

The Plaintiff has asserted claims for alleged violation of 42 U.S.C. §1983.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal?

ANSWER:

Not to the knowledge of Defendants.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service on an amended summons and pleading reflecting the correct identification.

ANSWER:

Defendants appear to be properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or

entity and describe the basis of said liability.

ANSWER:

None known to Defendants at this time.

HOLCOMBE BOMAR, P. A.

/s/ A. Todd Darwin

A. Todd Darwin (Fed I.D. No. 6382)
J. Hollis Inabinet (Fed I.D. No. 11550)
Post Office Box 1897
Spartanburg, South Carolina 29304
(864) 594-5300
tdarwin@holcombebomar.com

Attorneys for Defendants